

EXHIBIT F



faegredrinker.com

Paul H. Saint-Antoine
Partner
paul.saint-antoine@faegredrinker.com
215-988-2990 direct

Faegre Drinker Biddle & Reath LLP
One Logan Square, Suite 2000
Philadelphia, Pennsylvania 19103
+1 215 988 2700 main
+1 215 988 2757 fax

April 24, 2020

VIA E-MAIL

Michael Zipfel, Esq.
Independence Blue Cross
1901 Market Street, 43rd Floor
Philadelphia, PA 19103
michael.zipfel@ibx.com

Re: *Federal Trade Commission, et al. v. Thomas Jefferson University, et al.*, No. 2:20-cv-01113 (E.D. Pa.)

Dear Mr. Zipfel,

This firm represents Thomas Jefferson University ("Jefferson"), one of the named defendants in *Federal Trade Commission, et al. v. Thomas Jefferson University, et al.* We are writing on behalf of Jefferson to provide you with information about the subpoenas served on Independence Blue Cross ("IBC") for certain data and documents, and to invite you to contact me with any questions or concerns you may have, particularly as it relates to the timing of IBC's responses.

As you know, the Federal Trade Commission ("FTC") and the Office of the Attorney General for the Commonwealth of Pennsylvania ("AG") recently filed a complaint in federal court seeking to block Jefferson's merger with Einstein Healthcare Network ("Einstein"). Jefferson and Einstein have answered the complaint and have opposed the request for an injunction, because they believe the merger is pro-competitive and will preserve access to important healthcare services, particularly for underserved communities in the North Philadelphia area. Moreover, to ensure that the court has the evidence it needs to reach an informed decision about the merger, Jefferson and Einstein are in the process of collecting relevant data and documents, including from third parties.

We understand that the current health care crisis may present substantial challenges for the third parties, including IBC, responding to the subpoenas served on them. Jefferson and Einstein will strive to minimize the burden and expense of compliance by the third parties, within the timetable set by the court for fact discovery. Accordingly, once you have had an opportunity to review the requests for data and documents, we invite you to speak with us to discuss ways in which the subpoena might be clarified or potentially modified, consistent with Jefferson and Einstein's discovery needs.

Michael P. Zipfel, Esq.

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Also, to protect any confidential information provided in response to these requests, the Court has entered a protective order that governs all material produced in connection with the subpoenas and in the matter captioned *Federal Trade Commission, et al. v. Thomas Jefferson University, et al.* No. 2:20-cv-01113 (E.D. Pa.). A copy of the protective order is attached for you to consult as you review and prepare to produce documents.

Thank you for your cooperation in responding to subpoenas served on IBC and, again, I invite you to contact me with any questions or concerns.

Very truly yours,

/s/ Paul H. Saint-Antoine

Paul H. Saint-Antoine

Enclosures